

Application No. 09/927,103  
Response Dated February 28, 2005  
Reply to Final Office Action of December 08, 2004

### **REMARKS/ARGUMENTS**

No claims have been cancelled. No claims have been added or amended. Claims 1 - 21 represent the set of claims currently pending in this Application. Responsive to the Final Office Action dated 12/08/2004, Applicant presents arguments below that Applicant believes should render the claims allowable. In the event, however, that the Examiner is not persuaded by Applicant's arguments, Applicant respectfully requests that the Examiner enter these remarks to clarify issues upon appeal. Reexamination and reconsideration of the Application in view of the following arguments are respectfully requested.

#### **Office Action Rejection under 35 USC § 103(a)**

The Examiner rejected claims 1-21 as being unpatentable over Selvin et al. (US Patent number 6,718,329 B1 hereinafter "Selvin") in view of Parupudi et al. (U.S. Patent No. 6,750,883 B1 hereinafter "Parupudi"). Applicant respectfully traverses these rejections for the reasons set forth below.

#### **Brief Summary of the Selvin Reference**

Selvin teaches a convenient method for creating a hypertext database from one or more source documents wherein the nodes and links within the hypertext database mirror the logical structure of the one or more source documents. (See column 5, lines 18-21; column 5, lines 29-31; column 6, lines 10-13; column 8, lines 31-37; column 8, lines 40-42; and column 11, lines 60-63.)

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Selvin does not teach providing a user determined hierarchical list of identifiers to direct a link management system for the purpose of linking various units of information in accordance with the needs of the user. Rather, Selvin teaches a convenient method for creating a linked structure that mirrors the existing logical structure of one or more source documents by analyzing the source documents themselves.

### **Brief Summary of The Parupudi Reference**

Parupudi teaches a context aware computing system. Hierarchical tree structures are defined to represent master and secondary worlds comprising physical and/or logical entities. A software tool creates the context aware computing environment by receiving information about the physical or logical entities to be included in the environment. This information is typically entered by a system administrator. Once the software tool creates a hierarchical tree structure, at least one node from one tree structure is linked to another tree structure (see column 2, lines 19-47; and column 16, lines 21-38.)

Parupudi does not teach providing a user determined hierarchical list of identifiers to direct a link management system for the purpose of linking various units of information in accordance with the needs of the user. In fact, Parupudi has no teaching regarding how the software tool is directed to link one hierarchical tree to another hierarchical tree.

### **Summary of Applicant's Invention**

Applicant's invention, as recited in independent claims 1, 8 and 15, is directed to a link management system that links units of information together based upon a list of

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identifiers that have been stored in a user determined relative hierarchical order, the identifiers identifying the units of information. The term "Units of information" is defined within the specification as including a collection of web pages or a collection of help files that are to be inter-linked by URL links (see page 1, lines 11-16).

In one embodiment of applicant's invention the user determined relative hierarchical order of identifiers directs the link management system to link the parent to each child, link each child to its parent, and link each child forward and backward for each level within the hierarchy. This set of rules can be observed in Figure 5a and 5b of Applicant's specification wherein six links are established with just a simple hierarchical list of three entities. It is apparent, with websites comprising hundreds of pages that the use of Applicant's invention will have an even more dramatic effect on ease of use for an informational developer linking or re-linking web pages or help files.

### **The Applicant's Claimed Invention Is Patentable Over the References**

#### **Claims 1, 8 and 15**

The Examiner rejected independent claims 1, 8, and 15 as being unpatentable over Selvin in view of Parupudi. To establish a prima facie case of obviousness, there must be some suggestion or motivation to combine reference teachings. The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination (see MPEP 2143.01).

Applicant respectfully asserts that there is no motivation, expressed or implied, to combine the teachings of Selvin and Parupudi and, accordingly, the Examiner has not

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made a prima facie case of obviousness with respect to claims 1, 8 and 15. The Examiner asserts that the combination is obvious because Parupudi, column 3, lines 1-21 teaches a means to modulate the information that is provided for various applications. Parupudi further teaches that this modulation is a function of the security policies associated with an application's identity. Applicant asserts that there is simply no motivation to combine Selvin and Parupudi based upon the teaching of a context aware computing environment including information modulation to adhere with security policies (Parupudi) and the teaching for generating a hypertext database to mirror the logical structure of one or more source documents (Selvin).

The examiner acknowledges that Selvin does not teach code for instructing said computer system to store said list of identifiers, wherein said list of identifiers has a user determined relative hierarchical order to direct said link management system in the creation of said links. The Examiner asserts, however, that Parupudi teaches code for instructing said computer system to store said list of identifiers, wherein said list of identifiers has a user determined relative hierarchical order to direct said link management system in the creation of said links. Applicant respectfully disagrees with the Examiner's conclusion.

Even though there is no basis for combining the references of Selvin and Parupudi (see arguments supra), Applicant respectfully asserts that even if these references are combined, nowhere in the combination is there a teaching for storing said list of identifiers, wherein said list of identifiers has a user determined relative hierarchical order to direct said link management system in the creation of said links. The Examiner's citation (Parupudi column 14, lines 3-45) fails to teach that a user determined relative

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hierarchical order of identifiers is used to direct a link management system to link units of information. In fact, nowhere within Parupudi can such a teaching be found. Parupudi (see column 16, lines 17-38) teaches that a software tool creates a hierarchical tree structure and then links at least one node of one tree structure with another tree structure. Parupudi does not teach how this linking by the software tool is directed nor how a particular node is selected for linking. Nor does Parupudi teach how the tree to which the node is linked is selected.

Parupudi does not teach on this aspect of the processing because the focus of Parupudi is on Context Aware computing and, given a context, how location dependent goods and services may be obtained by a user. Accordingly, Applicant respectfully asserts that the combination of Selvin and Parupudi does not teach this claimed element of applicant's invention.

Claims 2-7, 9-14 and 16-21


Since claims 2-7, 9-14 and 16-21 are respectively dependent, directly or indirectly, on claims 1, 8 and 15, the above articulated arguments related to claims 1, 8 and 15 apply with equal force to claims 2-7, 9-14 and 16-21. Accordingly claims 2-7, 9-14, and 16-21 are respectfully asserted to be allowable over the cited references.

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**Conclusion**

In view of the arguments presented herein, reconsideration and allowance of this Application are now believed to be in order, and such actions are hereby solicited. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this Application, the Examiner is invited to telephone the undersigned at the number provided.

Respectfully submitted,

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